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**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT
and
SEIZURE WARRANTS FOR BANK ACCOUNTS & VEHICLE**

I, Cory P. McManus, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I make this affidavit in support of an application for a criminal complaint charging FOLA ALABI (Y.O.B. 1970), aka FOLAYEMI ALABI with Mail Fraud in violation of 18 U.S.C. § 1341, Wire Fraud in violation of 18 U.S.C. § 1343, Conspiracy to Commit Wire Fraud and Mail Fraud, in violation of 18 U.S.C. § 1349, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h) and the Senior Citizens Against Marketing Scams Act of 1994 (“SCAMS Act”) in violation of 18 U.S.C. § 2326.
2. I make this affidavit in support of applications for seizure warrants for the following bank accounts (the “SUBJECT FUNDS”) and vehicle (the “SUBJECT VEHICLE”):
 - a. all funds in First Service Credit Union (FSCU) Account Number #xxx2685, opened by Fola ALABI in the name Full Circle Imports Exports Inc. as further described in Attachment A.
 - b. all funds in FSCU Account Number #xxx9205, opened by Moriamo ALABI in the name Mobagold as further described in Attachment B.
 - c. all funds in Comerica Bank Account Number #xxxxxx2125, opened by Moriamo ALABI in the name Moriamo Alabi dba Mobagold as further described in Attachment C.
 - d. all funds in Bank of America Account Number #xxxxxxxx0376, opened by Folayemi ALABI in the name Ray of Hope Foundation Inc. as further described in Attachment D.
 - e. a 2010 Mercedes-Benz GL450 (VIN: 4JGBF7BE9AA599657) black in color, registered in the name Fola Alabi, 11018 Croftmore Dr., Richmond, TX 77407 as further described in Attachment E.

I request that a seizure warrant, authorizing the seizure of the SUBJECT FUNDS and SUBJECT VEHICLE pursuant to 21 U.S.C. § 853(f), and 18 U.S.C. §§ 981(b) and 982(b)(1) be issued by this Court.

3. Pursuant to 18 U.S.C. § 981(b), “notwithstanding the provisions of rule 41(a) of the Federal rules of Criminal Procedure, a seizure warrant may be issued pursuant to this subsection by a judicial officer in any district in which a forfeiture against the property may be filed.” Further, pursuant to 21 U.S.C. § 853(f), the Government may request a seizure warrant for property subject to forfeiture and “[i]f the court determines that there is probable cause to believe that the property to be seized would, in the event of conviction, be subject to forfeiture and that a [restraining order or injunction] order under subsection (e) may not be sufficient to assure the availability of the property for forfeiture, the court shall issue a warrant authorizing the seizure of such property.” Finally, 28 U.S.C. § 853(l) provides, “The district courts of the United States shall have jurisdiction to enter orders as provided in this section without regard to the location of any property which may be subject to forfeiture under this section, or which has been ordered forfeited under this section.”
4. For the reasons set forth below, there is probable cause to believe that funds in each of the aforementioned bank accounts were derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), wire and mail fraud conspiracy (18 U.S.C. § 1349). As such, those funds in the bank accounts are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(C), 984 and 28 U.S.C. § 2461, and 18 U.S.C. § 2328. Furthermore, there is also probable cause to believe that the entirety of the funds in each of those bank accounts, namely the SUBJECT FUNDS and separately the SUBJECT VEHICLE were involved in money laundering activity in violation of 18 U.S.C. § 1956(a)(1) and money laundering conspiracy in violation 18 U.S.C. § 1956(h) and are forfeitable under 18 U.S.C. §§ 981(a)(1)(A) and 982(a)(1).
5. The facts set forth in the Affidavit are based on my personal observations, my training and experience, information obtained from other agents, witnesses, and records obtained during the course of the investigation. Because I submit this Affidavit for the limited purpose of showing probable cause, I have not included in this Affidavit each and every

fact that I have learned in this investigation. Rather, I have set forth only facts sufficient to establish probable cause to issue an arrest warrant for the individuals identified herein and to seize the bank accounts set forth herein. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. AFFIANT BACKGROUND

6. I have been a law enforcement officer for over 18 years and have been a United States Postal Inspector since July 2017. I am currently assigned to the Providence, Rhode Island domicile of the United States Postal Inspection Service and I am responsible for the investigation of various crimes relating to the United States Mail including, but not limited to mail fraud, bank fraud, identity theft, and mail theft. Prior to my appointment as a Postal Inspector, I was a Special Agent with the United States Secret Service for approximately 13 years. I have received training in conducting investigations of crimes that adversely affect, or fraudulently use, the United States Mail and the United States Postal Service (USPS). I have participated in criminal investigations of various violations of Title 18 of the United States Code involving financial crimes, including mail, bank, and wire fraud, identity theft, money laundering, and computer crimes. In the course of my employment, I have received training and have been involved in the use of investigative techniques such as interviewing victims, informants, and witnesses, conducting physical surveillance, and analyzing financial records. I have participated in and executed dozens of search, arrest, and seizure warrants.

III. PROBABLE CAUSE

A. Background of Investigation

7. As set forth in this Affidavit, the U.S. Attorney's Office for the District of Rhode Island, the U.S. Postal Inspection Service (USPIS), Federal Bureau of Investigation (FBI), Homeland Security Investigations (HSI) and the U.S. Secret Service (USSS) have been investigating an online scheme in which the perpetrators used emotional appeals to quickly gain the trust of individuals through any number of fraudulent representations and, as a result, were able to instruct the individuals to send money to addresses controlled by suspected perpetrators and then deposited into bank accounts controlled by the suspected perpetrators.

8. While the investigation is ongoing, 11 individuals who sent money through the mail have been interviewed and identified as victims. From the victim interviews, records provided by the victims, and bank records of the SUBJECT FUNDS, these victims have sent via U.S. Postal mail a total of approximately \$915,301 to 11018 Croftmore Dr, Richmond, TX 77407. Fola ALABI and Moriamo ALABI, believed to be Fola ALABI's wife,¹ are the listed property owners for 11018 Croftmore Dr, Richmond, TX 77407, a residential property. This is also the address listed on both of their Texas drivers' licenses. From July 2021 through April 2022, checks and cash were mailed to purported companies registered to either F. ALABI or M. ALABI at the Croftmore Dr. residence. As described further below, the victims who were interviewed were contacted via Facebook and either misled by an individual feigning romantic intentions or by an individual posing as a family member with an investment opportunity. Both schemes involved the victims being instructed to send money to entities, including "FULL CIRCLE IMPORTS EXPORTS" and "MOBAGOLD" with the address of 11018 Croftmore Dr., Richmond, TX 77407. The victims believed the money they were sending was to help their overseas love interest or for managing their investment funds.

B. FULL CIRCLE IMPORTS EXPORTS INC., MOBAGOLD, and RAY OF HOPE FOUNDATION

9. Records maintained by the Secretary of State for the State of Texas revealed FULL CIRCLE IMPORTS EXPORTS INC. was incorporated under the laws of the State of Texas on October 21, 2018, by Fola ALABI, who is listed as the Director with a listed address of 11018 Croftmore Dr, Richmond, TX 77407. As of May 10, 2022, Texas Comptroller open-source records list this purported business as still active.
10. Harris County (TX) clerk's office records for MOBAGOLD contain a receipt of operation under Assumed Name MOBAGOLD date stamped July 23, 2019 and lists the owner as Moriamo A. ALABI². Notably, there is no record for MOBAGOLD in the Secretary of State for the State of Texas' records.

¹ Records received from Midland Mortgage pursuant to a Grand Jury subpoena revealed Fola Alabi and Moriamo Alabi are listed as husband and wife on the property's deed of trust.

² International Bank of Commerce (IBC) bank records for (IBC) Account xxxxxx0624 in the name of Moriamo ALABI with her driver's license as identification lists Moriamo ALABI's

11. Records maintained by the Secretary of State for the State of Texas revealed the RAY OF HOPE FOUNDATION INC. was incorporated under the laws of the State of Texas on May 4, 2021, by Fola ALABI, who is listed as the Director with a listed address of 10601 Clarence Dr, Suite 250, Frisco, TX 75033. As of May 10, 2022, Texas Comptroller open-source records list this purported business as still active.

C. Victim Reports and Victim Losses

JH (from Rhode Island) Sends \$60,000 to FULL CIRCLE IMPORTS EXPORTS INC.

12. On February 2, 2022, I interviewed JH, a 78-year-old widow who resides in Westerly, Rhode Island. She stated she met a man via Facebook who identified himself as “General Austin Miller” in June of 2021. “General Miller” told her he was a four-star general in the Army and was currently overseas. JH stated after gaining her trust, “General Miller” asked for her assistance in getting his personal belongings back to the United States, and in doing so, JH was instructed to send money. JH provided me with a Bank of America (BOA) cashier’s check receipt for a \$60,000 cashier’s check made payable to FULL CIRCLE IMPORTS EXPORTS at 11018 Croftmore Dr, Richmond, TX 77407. In addition, JH stated during her initial interview with Westerly PD on January 18, 2022, that she recently sold her home and was attempting to withdraw the proceeds of the sale (\$240,000) in her Westerly Community Credit Union account to send to “General Miller” at Full Circle Imports Exports Inc., 11018 Croftmore Dr., Richmond, TX. The \$240,000 was never sent due to Westerly Community Credit Union contacting the Westerly Police Department and putting a hold on her account.

RK (from Tennessee) Sends \$86,801 to FULL CIRCLE IMPORTS EXPORTS INC.

13. On or around March 21, 2022, FBI agents interviewed RK. RK is 77 years old and resides in Lewisburg, TN. RK stated she met a man via Facebook who identified himself as “General James Welsh” in December of 2021. “General Welsh” told her he was a four-star general in the Army and was currently deployed in Syria. RK stated she started sending money to “General Welsh” to help pay for his return home since he was unable

occupation as “Not Employed – Homemaker” and her source of income is indicated as “Spouses/Chief Executives.”

to access his accounts. As a result, RK stated that she mailed a bank check made payable to “Cash” (\$15,700) and one cashier’s check (\$71,101), totaling \$86,801, made payable to FULL CIRCLE IMPORTS EXPORTS at 11018 Croftmore Dr, Richmond, TX 77407.

DS (from North Carolina) Sends \$30,000 to FULL CIRCLE IMPORTS EXPORTS INC.

14. On March 3, 2022, FBI agents interviewed DS. DS is a 66 year old divorcee who resides in Statesville, NC. DS stated she met a man via Facebook who identified himself as “General Scott Berrier” in December of 2021. “General Berrier” told her he was a general in the Army and was currently stationed in Iraq. DS stated she started sending money to “General Berrier” to help pay to have his portfolio containing his military orders released after being seized by customs. As a result, DS stated that she mailed cash on six occasions totaling \$30,000 to FULL CIRCLE at 11018 Croftmore Dr, Richmond, TX 77407. After the interview that same day, DS e-mailed the FBI photographs of the packages that she had taken before she had mailed the packages.

SW (from California) Sends \$70,000 to FULL CIRCLE IMPORTS EXPORTS INC. & MOBAGOLD

15. On or around March 7, 2022, FBI agents interviewed SW. SW is 79 years old and resides in San Jose, CA. SW stated she met a man via Facebook who identified himself as “General James McConville” in September of 2021. “General McConville” told her he was a general in the Army and was currently stationed in Afghanistan. SW stated she started sending money to “General McConville” to help pay for his early release from the military along with airfare back to the United States. SW stated that she sent most of the money via cashier’s checks through the USPS to various addresses and the USPS receipts provided by SW showed SW mailed a cashier’s check in the amount of \$35,000 made payable to MOBAGOLD at 11018 Croftmore Dr, Richmond, TX 77407. Receipts provided by SW also showed that she mailed a cashier’s check in the amount of \$35,000 made payable to FULL CIRCLE IMPORT AND EXPORT INC. at 11018 Croftmore Dr, Richmond, TX 77407. SW’s husband told agents that based upon his review of financial records, he estimated that SW has lost around \$480,000 to this scam.

GR (from West Virginia) Sends \$64,000 to FULL CIRCLE IMPORTS EXPORTS, INC.

16. On April 7, 2022, FBI agents interviewed GR. GR is an 84-year-old widow who resides in Hedgesville, WV. GR stated she met a man via Facebook who identified himself as “General Austin Miller” in February of 2022. “General Miller” told her he was a four-star general in the Army and was currently stationed in Syria. GR stated she started sending money to a “courier” who was assisting “General Miller” with shipping gold bars and jewels out of Syria. GR stated that when the portfolio arrived in the United States, General Miller would come back to the United States to be with GR. As a result, GR stated that she mailed cash on multiple occasions in February and March 2022 totaling \$64,000 to FULL CIRCLE IMPORTS EXPORTS at 11018 Croftmore Dr, Richmond, TX 77407. GR provided agents with receipts and photographs that she had taken of the cash prior to being mailed to the Croftmore address, including cash wrapped with yellow/white money bands.

DC (from Florida) Sends \$100,000 to FULL CIRCLE IMPORTS EXPORTS, INC.

17. On or around March 17, 2022, FBI agents interviewed DC. DC is an 80-year-old widow who resides in Starke, FL. DC stated she received a Facebook message from someone she initially believed to be her brother in September or October of 2021. The message was related to an investment opportunity. After expressing interest in the investment, DC was contacted over the phone and instructed to send money. As a result, DC stated that she mailed a cashier’s check in the amount of \$100,000 made payable to FULL CIRCLE IMPORTS EXPORTS at 11018 Croftmore Dr, Richmond, TX 77407. I also interviewed DC on April 5, 2022. DC stated that shortly after mailing the check, DC spoke to her brother over the phone who advised her that his Facebook account was hacked, and that she was scammed.

JS (from Wisconsin) Sends \$90,000 to FULL CIRCLE IMPORTS EXPORTS, INC.

18. On December 1, 2021, Detective Charles Walton (Eau Claire PD) interviewed JS. JS is an 81-year-old widow who resides in Eau Claire, WI. JS stated she’s been speaking to a man via Google Hangouts who identified himself as “General Scott Barrier.” “General

Barrier” told her he was a general in the Army and was currently stationed in Iraq. JS stated she was sending money to “General Barrier” to help him get some documents and gold out of Iraq. BOA records, as identified below, show two cashier’s checks totaling \$90,000 made payable to FULL CIRCLE IMPORTS EXPORTS at 11018 Croftmore Dr, Richmond, TX 77407, were deposited into the BOA account for Full Circle Imports Exports.

SC (from Arizona) Sends \$334,500 to MOBAGOLD

19. On April 14, 2022, I interviewed SC. SC is a 70-year-old widow who resides in Prescott Valley, AZ. SC stated that she lost her husband on Valentine’s Day in 2021. SC stated she met a man via Facebook who identified himself as “General Austin Miller” in May of 2021 while she was in the hospital. “General Miller” told her he was in the Army and was currently stationed in Kabul (Afghanistan) and Syria. SC stated she started sending money via FedEx and the USPS to a “diplomatic courier” who was assisting “General Miller” with shipping important papers and jewels out of Syria. FSCU bank records as identified below show three cashier’s checks totaling \$334,500 made payable to MOBAGOLD at 11018 Croftmore Dr, Richmond, TX 77407 were deposited into the FSCU account for MOBAGOLD. SC admitted that she has lost over \$925,000, to include selling her home, RV, and jewelry to support this scam. SC stated that she has felt shame, embarrassment, and guilt over being scammed. SC stated that she did not have food to eat last week and has not been able to pay her bills. SC stated “General Miller” is still contacting her and wanted her to send another \$1300 in the morning. Shortly after my interview, SC was hospitalized due to concerning comments she made to me and officers from the Prescott Valley PD.

DP (from Texas) Sends \$55,000 to MOBAGOLD

20. On April 15, 2022, I interviewed DP. DP is a 68-year-old widow who resides in New Waverly, TX. DP stated she met a man via a messenger app who identified himself as “General Glenn Goddard” in the summer of 2021. “General Goddard” told her he was in the Army and was currently stationed in Syria. DP stated she started sending money to a “courier” who was assisting “General Goddard” with shipping gold, diamonds and jewels out of Syria. As a result, DP mailed cashier’s checks to Mobagold to help “General Goddard.” FSCU bank records as identified below show six cashier’s checks totaling

\$55,000, made payable to MOBAGOLD at 11018 Croftmore Dr, Richmond, TX 77407, deposited into a FSCU account for MOBAGOLD.

SH (from Idaho) Sends \$20,000 to FULL CIRCLE IMPORTS EXPORTS, INC.

21. On or around April 14, 2022, FBI agents interviewed SH. SH is 66 years old and resides in Nampa, ID. SH stated she met a man via Facebook who identified himself as “General Austin Miller” in May of 2021. “General Miller” told her he was a general in the US Armed Forces and was currently stationed in Afghanistan. SH stated she started sending money to “General Austin” to help pay for shipping his possessions back to the United States. SH stated that she mailed cash totaling \$20,000 to FULL CIRCLE at 11018 Croftmore Dr, Richmond, TX 77407.

JM (from South Dakota) Sends \$5,000 to FULL CIRCLE IMPORTS EXPORTS, INC.

22. On or around April 5, 2022, FBI agents interviewed JM. JM is a 57-year-old widow who resides in Wanblee, SD. JM stated she met a man via Facebook who identified himself as “General Scott Berrier” in December of 2021. “General Berrier” claimed to be stationed in Afghanistan. JM stated that “General Barrier” would tell JM that he cared for her. JM stated that she spoke to “General Barrier” on one occasion and described him as speaking with broken English. JM stated she started sending money to “General Berrier” to help pay for his portfolio which he claimed was worth a lot of money. JM stated that she mailed cash totaling \$5,000 to FULL CIRCLE at 11018 Croftmore Dr, Richmond, TX 77407.

D. Victim Funds Were Deposited into Bank Accounts Controlled by Fola ALABI and Moriamo ALABI.

Bank of America Acct xxxxxxxx9125 – Full Circle Imports Exports, Inc.

23. Bank of America (BOA) records show that BOA Account xxxxxxxx9125 was opened by Folayemi ALABI on November 30, 2021, in the name of Full Circle Imports Exports Inc. The mailing address for the account was listed as 14221 Alief Clodine Rd, Houston, TX 77082, and an employee identification number (EIN) 83-2310226³ on the account opening paperwork. Additionally, signatory authority was provided and signed for by

³ A FinCen query related to EIN 83-2310226 revealed it is associated with Full Circle Imports Exports Inc. in Houston, TX.

Folayemi ALABI who listed his title as “director” on the account opening paperwork. A review of BOA xxxxxxxx9125 records revealed three deposited cashier’s checks from two interviewed victims totaling \$150,000:

CHECK #	BANK	PAYOR	AMOUNT	DATE DEPOSITED	BANK	DEPOSIT ACCT #	NAME
128502	COMMUNITY STATE BANK	DC	\$ 100,000.00	18-Jan-2022	BANK OF AMERICA	488105839125	FULL CIRCLE IMPORTS EXPORTS
168663	CHARTER BANK	JS	\$ 50,000.00	10-Jan-2022	BANK OF AMERICA	488105839125	FULL CIRCLE IMPORTS EXPORTS

24. A review of BOA Account xxxxxxxx9125 revealed that this account was used almost entirely for the deposit and laundering of fraud proceeds. Between November 2021 when this account was opened until February 2022 when BOA closed the account, this account was primarily funded by victims’ checks. Further review of the account revealed no ACH or check deposits indicative of legitimate employment or related to the sale or purchase of vehicles.
25. As referenced in paragraph 18, on or around January 7, 2022, JS mailed cashier’s check #168663 in the amount of \$50,000 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. BOA records show that on January 10, 2022, cashier’s check #168663 was successfully deposited into BOA Account xxxxxxxx9125. BOA records further show that on January 18, 2022, a wire transfer of \$42,286.76 was made from this account to a bank account in India.
26. As referenced in paragraph 17, on January 14, 2022, DC mailed cashier’s check #128502 in the amount of \$100,000 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. BOA records show that on January 18, 2022, cashier’s check #128502 was successfully deposited into BOA Account xxxxxxxx9125. Prior to the check clearing, Bank of America froze the funds after a brief investigation revealed the funds were related to a fraud.
27. BOA records show that on January 27, 2022, an individual who identified himself as Fola ALABI called BOA Fraud Services and spoke with a BOA employee. The phone call was recorded. The BOA employee stated that she was going to send a text message with a six-digit code to the phone number that he was calling from to verify his identify. The individual almost immediately recited a six-digit code to the BOA employee. The individual called about a freeze on his business account and was instructed to call Dennis Eaton’s number and provided with Investigator’s Eaton’s number.

28. Based upon my interview with BOA Investigator Dennis Eaton, I learned that on January 27, 2022, an individual who identified himself as Fola ALABI contacted, via telephone, Investigator Eaton regarding the freeze on his account. Investigator Eaton's caller ID captured F. ALABI's phone number as 678-650-9126⁴. ALABI indicated he owned a car dealership⁵ in Houston and received a \$100,000 credit to purchase building materials from China on behalf of an un-named female "intermediary." ALABI claimed the money was for roofing materials and tiles but could not provide the "intermediary" or developer's name. ALABI stated that the "intermediary" was in Florida and this was the third time dealing with her. ALABI stated the "intermediary" usually comes to meet him in Texas but stated she sent a proxy named Daniel Thompson instead.
29. Based on the conflicting interviews with F. ALABI and the victim DC, a "hold harmless" claim was submitted by the issuing bank, Community State Bank, and the funds were returned to DC. Additionally, based on the findings of the internal investigation, Bank of America closed Account xxxxxxxx9125 on February 3, 2022.

First Service Credit Union Acct xxx2685 – Full Circle Imports Exports, Inc.

30. FSCU records show that FSCU Account xxx2685 was opened by Fola ALABI on February 21, 2020, in the name Full Circle Imports Exports Inc. The mailing address of 11018 Croftmore Dr, Richmond, TX 77407, and a Texas driver's license (281143188⁶), and a phone number of (678) 650-9126 was provided on the account opening paperwork. Additionally, signatory authority was provided and signed for by Fola ALABI who listed his title as "owner" on the account opening paperwork. A review of FSCU Account xxx2685 records revealed cashier's checks and cash from four identified victims totaling approximately \$221,101.

⁴ Verizon records pursuant to a Grand Jury subpoena revealed phone number 678-650-9126 has been registered to F. ALABI (11018 Croftmore Dr, Richmond, TX) since October 17, 2019. Additionally, toll records for 678-650-9126 showed a call on January 27, 2022, to BOA Investigator Eaton's office number.

⁵ Texas DMV records revealed Alabi was issued a vehicle dealers license on February 1, 2019, but it expired due to a non-renewal on May 1, 2021. A query of Alabi's identifiers revealed no other dealer licenses associated with him.

⁶ Texas Department of Motor Vehicles records revealed Texas DL 28143188 is assigned to Fola ALABI, 11018 Croftmore Dr, Richmond, TX 77407.

CHECK #	BANK	PAYOR	AMOUNT	DATE DEPOSITED	BANK	DEPOSIT ACCT #	NAME
168866	CHARTER BANK	JS	\$ 40,000.00	20-Jan-2022	FIRST SERVICE CU	5462685	FULL CIRCLE IMPORTS EXPORTS
1426410464	BANK OF AMERICA	JH	\$ 60,000.00	29-Nov-2021	FIRST SERVICE CU	5462685	FULL CIRCLE IMPORTS EXPORTS
169762	FIRST COMMERCE BANK	RK	\$ 71,101.00	21-Jan-2022	FIRST SERVICE CU	5462685	FULL CIRCLE IMPORTS EXPORTS
CASH	TRUIST FINANCIAL	GR	\$ 50,000.00	24-Mar-2022	FIRST SERVICE CU	5462685	FULL CIRCLE IMPORTS EXPORTS

31. A review of FCSU Account xxx2685 revealed that this account was used almost entirely for the deposit and laundering of fraud proceeds. Between October 1, 2021, when the first victim check was deposited until the present date, this account was primarily funded by victims' checks. Further review of the account revealed no ACH or check deposits indicative of legitimate employment or related to the sale or purchase of vehicles.
32. As referenced in paragraph 12, on November 26, 2021, JH mailed cashier's check #1426410464 in the amount of \$60,000 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. FSCU bank records show that on November 29, 2021, cashier's check #1426410464 was successfully deposited into FSCU Account xxx2685. Bank video surveillance provided by FSCU pursuant to a Grand Jury subpoena shows a male, that I have identified as Fola ALABI from his Texas driver's license photo, arriving in a black Range Rover prior to making the aforementioned deposit. On December 2, 2021, \$58,680 was wire transferred from FSCU Account xxx2685 to the Ray of Hope Foundation Inc.
33. As referenced in paragraph 18, on or around January 19, 2022, JS mailed cashier's check 168866 in the amount of \$40,000 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. FSCU records show that on January 20, 2022, cashier's check 168866 was successfully deposited into FSCU Account xxx2685. Bank video surveillance provided by FSCU pursuant to a Grand Jury subpoena and that I have reviewed shows Fola ALABI arriving in a black Range Rover prior to making the aforementioned deposit.
34. As referenced in paragraph 13, on January 21, 2022, RK mailed cashier's check #169762 in the amount of \$71,101 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. FSCU records show that on January 21, 2022, cashier's check #169762 was successfully deposited into FSCU Account xxx2685. Bank video surveillance provided by FSCU pursuant to a Grand Jury subpoena and that I have reviewed shows Fola ALABI arriving in a black Range Rover prior to making the aforementioned deposit. FSCU records show that on January 25, 2022, \$24,189.67 was

wire transferred to Shouguang Sunrise Industry Co., LTD's bank account in China. FSCU records then show that on January 31, 2022, \$60,000 was wire transferred to Shouguang Sunstar International Trading Co., LTD's bank account in China.

35. As referenced in paragraph 16, on March 24, 2021, GR mailed cash in the amount of \$50,000 to Full Circle Imports Exports at 11018 Croftmore Dr, Richmond, TX 77407. That package was delivered successfully on March 25, 2022. FSCU records show that on March 28, 2022, a cash deposit of \$26,400 was made into FSCU Account xxx2685. Bank video surveillance provided by FSCU pursuant to a Grand Jury subpoena and that I have reviewed shows Fola ALABI depositing cash with yellow/white money bands that are identical in color and size to the picture of the money bands and cash provided by GR.
36. Additional bank video surveillance provided by FSCU pursuant to a Grand Jury subpoena shows a female that I have identified as Moriamo ALABI from her Texas driver's license photo arriving in the SUBJECT VEHICLE and depositing two checks totaling \$28,000 from DG on December 13, 2021, one check in the amount of \$40,000 from CM on December 28, 2021, and one check in the amount of \$40,000 from MR on February 7, 2022, into FSCU Account xxx2685. While DG, CM, and MR have not yet been interviewed, based upon similarities with other victims that have been interviewed including their ages, the large dollar amounts on the checks, the fact that the checks were cashier's checks, and my training and experience, the deposit of these checks are consistent with money laundering of victims' money.

First Service Credit Union Acct xxx9205 – Mobagold

37. FSCU bank records show FSCU Account xxx9205 was opened by Moriamo ALABI on February 23, 2021, in the name "Mobagold," listing a mailing address of 11018 Croftmore Dr, Richmond, TX 77407, and providing a Texas driver's license (38519502⁷) on the account opening paperwork. Additionally, signatory authority was provided and signed for by Moriamo ALABI who listed her title as "owner" on the account opening paperwork. A review of FSCU Account xxx9205 records revealed eight deposited cashier's checks from three identified victims totaling \$399,000 as shown below:

⁷ Texas Department of Motor Vehicles records revealed Texas DL 38519502 is assigned to Moriamo ALABI, 11018 Croftmore Dr, Richmond, TX 77407.

CHECK #	BANK	PAYOR	AMOUNT	DATE DEPOSITED	BANK	DEPOSIT ACCT #	NAME
9105674323	CAPITAL ONE BANK	DP	\$ 5,000.00	13-Sep-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9105674379	CAPITAL ONE BANK	DP	\$ 20,000.00	20-Sep-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9105674423	CAPITAL ONE BANK	DP	\$ 2,000.00	25-Sep-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9105674422	CAPITAL ONE BANK	DP	\$ 10,000.00	25-Sep-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9105674542	CAPITAL ONE BANK	DP	\$ 8,000.00	13-Oct-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9182928150	CHASE	SC	\$ 300,000.00	13-Aug-2021	FIRST SERVICE CU	5499205	MOBAGOLD
9182928193	CHASE	SC	\$ 19,000.00	24-Aug-2021	FIRST SERVICE CU	5499205	MOBAGOLD
5020684	WELLS FARGO	SW	\$ 35,000.00	16-Oct-2021	FIRST SERVICE CU	5499205	MOBAGOLD

38. A review of FCSU Account xxx9205 revealed that this account was used almost entirely for the deposit and laundering of fraud proceeds. Between August 2, 2021, when the first victim check was deposited until the present date, this account was primarily funded by victims' checks. Further review of the account revealed no ACH or check deposits indicative of legitimate employment.
39. As referenced in paragraph 19, on or around August 12, 2021, and August 23, 2021, SC mailed cashier's checks #9182928150 and #9182928193 in the amount of \$300,000 and \$19,000 respectively to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. On August 13, 2021, bank records show that cashier's check #9182928150 was successfully deposited into FSCU Account xxx9205. On August 16, 2021, a \$260,000 check from Mobagold FSCU Account xxx9205 (Mobagold) was deposited into FCSU Account xxx2685 (Full Circle). On August 24, 2021, bank records show that cashier's check #9182928193 was successfully deposited into FSCU Account xxx9205.
40. As referenced in paragraph 20, between September 10, 2021, and October 5, 2021, DP mailed the following cashier's checks totaling \$45,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407:
- On or around September 10, 2021, DP mailed cashier's check #9105674323 in the amount of \$5,000 to Mobagold. On September 13, 2021, cashier's check #9105674323 was successfully deposited into FSCU Account xxx9205.
 - On or around September 16, 2021, DP mailed cashier's check #9105674379 in the amount of \$20,000 to Mobagold. On September 20, 2021, cashier's check #9105674379 was successfully deposited into FSCU Account xxx9205.
 - On or around September 23, 2021, DP mailed cashier's checks #9105674423 in the amount of \$2,000, and #9105674422 in the amount of \$10,000 to Mobagold. On September 25, 2021, cashier's checks #9105674423 and #9105674422 totaling \$12,000 were successfully deposited into FSCU Account xxx9205.

Additionally, on or about October 5, 2021, DP mailed cashier's check 9105674542 in the amount of \$8,000 to Mobagold. On October 13, 2021, cashier's check #9105674542 was successfully deposited into FSCU Account xxx9205.

- d. Notably, on September 10, 2021, a \$40,000 check from FSCU Account xxx9205 (Mobagold) was made payable to Fola Alabi and deposited into FCSCU Account xxx2685 (Full Circle).
41. As referenced in paragraph 15, on October 12, 2021, SW mailed cashier's check #5020684 in the amount of \$35,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. Bank records show that on October 16, 2021, cashier's check #5020684 was successfully deposited into FSCU Account xxx9205.

Comerica Bank Acct xxxxxx2125 – Moriamo Alabi dba Mobagold

42. Comerica Bank records show that Account xxxxxx2125 was opened by Moriamo ALABI on May 7, 2021, in the name Moriamo ALABI dba Mobagold. A mailing address of 11018 Croftmore Dr, Richmond, TX 77407, and a social security number of xxx-xx-8128 was provided on the account opening paperwork. Additionally, signatory authority was provided and signed for by Moriamo ALABI who listed her title as "owner" on the account opening paperwork. A review of Comerica Bank Account xxxxxx2125 (Mobagold) revealed four deposited cashier's checks from two interviewed victims totaling \$25,500.

CHECK #	BANK	PAYOR	AMOUNT	DATE DEPOSITED	BANK	DEPOSIT ACCT #	NAME
9105674548	CAPITAL ONE BANK	DP	\$ 10,000.00	12-Oct-2021	COMERICA	1883222125	MORIAMO A ALABI DBA MOBAGOLD
9182928207	CHASE BANK	SK	\$ 15,500.00	26-Aug-2021	COMERICA	1883222125	MORIAMO A ALABI DBA MOBAGOLD

43. A review of Comerica Account xxxxxx2125 revealed that this account was used almost entirely for the deposit and laundering of fraud proceeds. Between August 26, 2021, when the first victim check was deposited until the present date, this account was primarily funded by victims' checks. Further review of the account revealed no ACH or check deposits indicative of legitimate employment.
44. As referenced in paragraph 19, on or around August 25, 2021, SC mailed cashier's check #9182928207 in the amount of \$15,500 to Mobagold located at 11018 Croftmore Dr, Richmond, TX 77407. Comerica bank records show that on August 26, 2021, cashier's

check #9182928207 was successfully deposited into Comerica Bank Account xxxxxx2125 (Mobagold). Comerica bank records further show that on August 30, 2021, \$24,490 was wire transferred from Comerica Bank Account xxxxxx2125 (Mobagold) to Ifourni Company Limited in China.

45. As referenced in paragraph 20, on or around October 5, 2021, DP mailed cashier's check #9105674548 in the amount of \$10,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. Comerica bank records show that on October 12, 2021, cashier's check #9105674548 was successfully deposited into Comerica Bank Account xxxxxx2125. Comerica bank records also show that on October 15, 2021, \$19,600 was wire transferred to Shouguang Sunstar International in China.

Bank of America xxxxxxxx0376– Ray of Hope

46. BOA records show that BOA Account xxxxxxxx0376 was opened by Fodayemi ALABI on August 5, 2021, in the name Ray of Hope Foundation Inc., listed as a non-profit corporation. The mailing address of 14221 Alief Clodine Rd, Unit A, Houston, TX 77082, and an EIN of 86-3688735 is listed on the account opening paperwork. Additionally, signatory authority was completed and signed for by Fodayemi ALABI who listed his title as “director” on the account opening paperwork.
47. As referenced in paragraph 12, on November 29, 2021, cashier's check #1426410464 in the amount of \$60,000 from identified victim JH was mailed to Full Circle Imports Exports at the Croftmore address. Bank records show that the cashier's check was deposited into FSCU Account xxx2685 (Full Circle Imports Exports). On December 2, 2021, Fola ALABI wired \$58,680 from FSCU Account xxx2685 to BOA Account xxxxxxxx0376 (Ray of Hope).⁸ On December 6, 2021, \$60,000 was wire transferred from BOA Account xxxxxxxx0376 (Ray of Hope) to Shandong Baiwei International in China.
48. Bank records show that on February 7, 2022, cashier's check #62480 in the amount of \$40,000 from MR was deposited into FSCU Account xxx2685 (Full Circle). On February 10, 2022, Fola ALABI wired \$34,329 from FSCU Account xxx2685 to BOA Account xxxxxxxx0376 (Ray of Hope).⁹ On February 11, 2022, \$35,329.86 was wire

⁸ Pursuant to the wire transfer, the remaining balance in FSCU Account xxx2685 was \$4.59

transferred from BOA Account xxxxxxxxxx0376 (Ray of Hope) to Guangdong Maydos Building Material in China.

49. On October 1, 2021, cashier's check #7260810345 in the amount of \$130,000 from JS2¹⁰ was deposited into FSCU Account xxx2685 (Full Circle). Bank records show that on October 14, 2021, check #1005, drawn on FSCU Account xxx2685 (Full Circle), made payable to Mobagold was deposited into FSCU Account xxx9205 (Mobagold). Continuing on the same date, cashier's check #457973 in the amount of \$129,000, drawn on FSCU Account xxx9205, made payable to Ray of Hope was deposited into BOA Account xxxxxxxxxx0376 (Ray of Hope). On October 25, 2021, \$128,690 was wired from BOA Account xxxxxxxxxx0376 (Ray of Hope) to Shouguang Sunstar International Trading Co., LTD in China.
50. On October 29, 2021, bank records show that a \$10,000 deposit was made into BOA Account xxxxxxxxxx0376 (Ray of Hope). Bank surveillance that I reviewed shows M. ALABI making the deposit.

E. Proceeds of Fraud Were Used to Pay Mortgage for 11018 Croftmore Dr.

51. Records received from Midland Mortgage pursuant to a Grand Jury subpoena revealed Fola ALABI and Moriamo ALABI purchased the property at 11018 Croftmore Drive, Richmond, TX on April 21, 2017, for \$345,000. They listed their relationship on several mortgage documents as husband and wife. The loan was originally serviced by Crestmark Mortgage but transferred to Midland Mortgage in August of 2018.
52. As referenced in paragraph 19, identified victim SC, on or around August 12, 2021, mailed cashier's check #9182928150 in the amount of \$300,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. On August 13, 2021, FSCU bank records show that cashier's check #9182928150 was deposited into FSCU Account xxx9205 (Mobagold). FSCU bank records show that on August 16, 2021, a \$260,000 check from FSCU Account xxx9205 (Mobagold) was deposited into FSCU Account xxx2685 (Full Circle). On the same date, \$155,000 of the previously deposited funds were withdrawn from FSCU Account xxx2685 (Full Circle) and deposited via cashier's check #453890

⁹ Pursuant to the wire transfer, the remaining balance in FSCU Account xxx2685 was \$145.21

¹⁰ JS2 is a separate individual than JS identified in Paragraph 33, and has not yet been interviewed.

into Bank of America (BOA) Account xxxxxxxx4468 (Full Circle). On August 17, 2021, bank records show that an ACH mortgage payment in the amount of \$2,876.48 was made to Midland Mortgage from BOA Account xxxxxxxx4468 (Full Circle).

53. Notably, bank records show that a total of \$14,448.71 in mortgage payments for 11018 Croftmore Dr. was paid to Midland Mortgage from approximately May 2021 to August 2021, from BOA Account xxxxxxxx4468 (Full Circle). In addition, from October 2020 to March 2021, BOA Account xxxxxxxx0232 (Full Circle) records show that a total of \$31,057.03 in mortgage payments were paid to Midland Mortgage. On the day of or a few days prior to these payments being made from the BOA Account xxxxxxxx0232 (Full Circle), funds covering the mortgage payment amounts were transferred from BOA Account xxxxxxxx4468 (Full Circle) to BOA Account xxxxxxxx0232 (Full Circle).
54. BOA records show that Account xxxxxxxx4468 (Full Circle) was opened by Folayemi ALABI, on June 26, 2020, in the name of "Full Circle Imports Exports Inc DBA Full Circle Procurement & Logistics." A mailing address of 11018 Croftmore Dr, Richmond, TX 77407, and an Employer Identification Number (EIN) of 83-2310226, were given at the time the account was opened.
55. As referenced in paragraph 20, on or around September 16, 2021, DP, an identified victim, mailed cashier's check #9105674379 in the amount of \$20,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. Bank records show that on September 17, 2021, cashier's check #9105674379 was deposited into FSCU Account xxx9205 (Mobagold). Prior to this check deposit, the account balance was \$14.12. Additionally, on September 25, 2021, two additional cashier's checks from DP totaling \$12,000 were deposited into FSCU Account xxx9205 (Mobagold). On September 27, 2021, at 10:36AM, a cash withdrawal in the amount of \$2,943 was made from FSCU Account xxx9205 (Mobagold). Continuing on the same day at 12:07PM, a cash deposit in the amount of \$3,005 was made at the same time that International Bank of Commerce (IBC) Account xxxxxxx0624 (M. Alabi) was opened. On September 29, 2021, an ACH mortgage payment in the amount of \$2,942.79 was made to Midland Mortgage from IBC Account xxxxxxx0624 (M. Alabi).
56. IBC records show that Account xxxxxxx0624 (M. Alabi) was opened by Moriamo ALABI on September 27, 2021. A mailing address of 11018 Croftmore Dr, Richmond, TX

77407, and a Texas driver's license number of 38519502 belonging to Moriamo ALABI, were provided at the time the account was opened.

57. As referenced in paragraph 15, on October 12, 2021, SW, an identified victim, mailed cashier's check #5020684 in the amount of \$35,000 to Mobagold at 11018 Croftmore Dr, Richmond, TX 77407. Bank records show that on October 16, 2021, cashier's check #5020684 was deposited into FSCU Account xxx9205 (Mobagold). On October 19, 2021, a cash withdrawal in the amount of \$5,200 was made from FSCU Account xxx9205 (Mobagold). On October 25, 2021, a cash deposit in the amount of \$3,430 was made into IBC Account xxxxxx0624 (M. Alabi). Prior to this cash deposit, the account balance was \$215.18. On October 27, 2021, an ACH mortgage payment in the amount of \$2,942.79 was made to Midland Mortgage from IBC Account xxxxxx0624 (M. Alabi).
58. Based on my investigation, I believe the movement of these funds to pay Fola and Moriamo ALABI's mortgage bill is indicative of money laundering. The process of laundering money typically involves three steps: placement, layering and integration.
- a. Placement of fraudulent funds ("dirty money") into the legitimate financial system. In this investigation, victim fraud funds were deposited into FSCU Accounts xxx2685 and xxx9205, associated with shell companies opened and maintained by Fola and Moriamo Alabi.
 - b. Layering conceals the source of the money through a series of transactions. In this investigation, once the victim fraud funds were deposited, there were a series of withdrawals via cash, wire and checks into various other "clean" accounts maintained by Fola and Moriamo Alabi.
 - c. In the final step, integration, the now-laundered money was withdrawn from the "clean" account and used for various legitimate expenditures. In this investigation, the money deposited into IBC Account xxxxxx0624, BOA Account xxxxxxxx0232 (Full Circle), and BOA Account xxxxxxxx4468 was used by Fola and Moriamo Alabi to pay their mortgage.

F. The SUBJECT VEHICLE Was Involved in Money Laundering

59. A CarFax report on the SUBJECT VEHICLE VIN revealed it was purchased at auction on or around September 20, 2021. A review of bank accounts associated with Moriamo and Fola ALABI failed to show any form of legitimate income during that time period.

As noted in Paragraph 34, the SUBJECT VEHICLE was used to deposit what is believed to be proceeds of the fraud on at least 3 separate dates, December 13, 2021, December 28, 2021, and February 7, 2022.

G. IP Information Associated with Victim Mailings

60. Proprietary US Postal databases show that at least five packages were sent by five identified victims and were tracked online on different dates by someone using Comcast IP 73.232.253.170. Records received from Comcast pursuant to a Grand Jury subpoena revealed that on the dates in question, Comcast IP¹¹ 73.232.253.170 was assigned to Fola ALABI with a service address of 11018 Croftmore Dr, Richmond, TX 77407. The five packages that were tracked with Comcast IP 73.232.253.170 are described below:

- (a) On February 3, 2022, SH, a 66-year-old resident of Idaho, sent USPS Priority Mail Express envelope (Tracking #EJ956571935US) to Full Circle Imports Exports, 11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 21, SH is an identified victim who has sent a total of \$20,000 to Full Circle Imports Exports. US Postal databases show that the package sent by SH was tracked online on February 4, 2022, at 23:43 CST by Comcast IP 73.232.253.170.
- (b) On January 13, 2022, JM, a 57-year-old resident of South Dakota, sent USPS Priority Mail Express envelope (Tracking #EJ901302858US) to Full Circle, 11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 22, JM is an identified victim who has sent a total of \$5,000 to Full Circle Imports Exports. Proprietary US Postal databases show that the package sent by JM was tracked online on January 15, 2022, at 17:39 CST, January 16, 2022, at 21:49 CST and January 17, 2022, at 12:46 CST by Comcast IP 73.232.253.170.
- (c) On January 13, 2022, RK, a 77-year-old resident of Tennessee, sent USPS Priority Mail Express envelope (Tracking #EJ931480111US) to Full Circle,

¹¹ An IP address is a numerical label assigned to each device connected to a computer network that uses the Internet Protocol for communication. An IP address is made up of numbers separated by dots and identifies a particular computer (or modem) on the Internet. Every computer (or modem) requires an IP address to connect to the Internet. IP addresses can be dynamic, meaning that the internet service provider (ISP) can assign a different unique number to a computer every time it accesses the Internet. IP addresses might also be static, if an ISP assigns a user's computer a particular IP address that is used each time the computer accesses the Internet.

11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 13, RK is an identified victim who has sent a total of \$86,801 to Full Circle Imports Exports. Proprietary US Postal databases show that the package sent by RK was tracked online on January 13, 2022, at 12:04 CST by Comcast IP 73.232.253.170.

(d) On February 3, 2022, DS, a 66-year-old resident of North Carolina, sent USPS Priority Mail Express envelope (Tracking #EI284303026US) to Full Circle, 11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 14, DS is an identified victim who has sent a total of \$30,000 to Full Circle Imports Exports. US Postal databases show that the package sent by DS was tracked online on February 4, 2022, at 17:33 CST, 18:47 CST and 23:43 CST respectively by Comcast IP 73.232.253.170.

(e) On March 24, 2022, GR, an 84-year-old resident of West Virginia, sent USPS Priority Mail Express envelope (Tracking #EJ752868864US) to Full Circle, 11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 16, GR is an identified victim who has sent a total of \$64,000 to Full Circle Imports Exports. US Postal databases show that the package sent by GR was tracked online on March 25, 2022, at 14:37 CST by Comcast IP 73.232.253.170.

61. Comcast IP 73.232.253.170 was also used to log into BOA Acct xxxxxxxx9125 (Full Circle) online numerous times on January 25, 26, and 27, 2022.

62. US Postal databases show that at least one package as identified below was sent by an identified victim and the package was tracked online by someone using Verizon IPv6¹² 2600:100d:b05d:c2fe:4095:f7ab:1819:91bb. Records received from Verizon pursuant to a Grand Jury subpoena revealed that on the date in question, the listed IPv6 was assigned to Verizon number 678-650-9126 under the name Fola ALABI (11018 Croftmore Dr, Richmond, TX).

(a) On January 21, 2022, DS, a 66-year-old resident of North Carolina, sent USPS Priority Mail Express envelope (Tracking #WI284302034US) to Full Circle, 11018 Croftmore Dr, Richmond, TX 77407. As referenced in paragraph 14,

¹² An Internet Protocol Version 6 address (or simply "IPv6 address") is a unique numeric address used by computers on the Internet. An IPv6 address is represented as eight groups of four digits, separated by colons (:), with each group representing 16 bits. Every computer attached to the internet must be assigned an IP or IPv6 address.

DS is an identified victim who has sent a total of \$30,000 to Full Circle Imports Exports. US Postal databases show that the package sent by DS was tracked online on January 22, 2022, at 13:10 CST, 13:15 CST and 13:58 CST respectively by Verizon IPv6 2600:100d:b05d:c2fe:4095:f7ab:1819:91bb.

H. Previous Interactions with Law Enforcement

63. On November 12, 2020, Fola ALABI was interviewed by the FBI regarding fraudulent activity by him and/or by his associates. ALABI stated he currently owns a business called Full Circle which entails buying and selling cars from auction and shipping them overseas. ALABI provided a dealer's license (P152515) that is used to operate his business. ALABI stated his gross income was between \$450,000-\$460,000 but admitted that his business has slowed down tremendously due to COVID¹³. ALABI acknowledged that he has had issues with banks closing his account due to "too much cash." ALABI stated he also owns a hair and textile business in Nigeria called Mobagold which he operates with his sister and cousin.
64. ALABI then physically showed interviewing Agents his car business, Full Circle, which was located at 14221 Alief Clodine Road, Houston, Texas 77082, where agents observed several used vehicles stored in a parking lot that were for sale.
65. In addition, ALABI was served with a money mule letter, which he signed and accepted that same day. The money mule letter provided notice that "you, and/or persons you are associating with, may been engaged in fraudulent activity that violates state and/or federal criminal laws. The fraudulent activity conducted by you and/or persons you are associating with may include:
- transmitting money via wires, ACH, mail, Western Union, MoneyGram, while not registered as a money services business
 - reshipping scams
 - work from home scams, mystery shoppers' scams, advance fee scams, romance scams."

The letter further advised that such fraudulent schemes would violate federal criminal laws.

¹³ Texas DMV records revealed between May 2019 and April 2021, Alabi (using dealers license P152515) sold 32 cars for a total profit of \$89,887.34.

66. A criminal history check for Fola ALABI includes a 2008 arrest by HSI for unlawful importation of a schedule I & II substance and manufacturing, distributing, or disbursing of a controlled substance that did not result in any formal charges. Additionally, in 2013, Fola ALABI was arrested by the Midland (TX) Police Department for Theft of Property Greater Than \$1500. After Alabi paid the restitution in full in that case, the case was dismissed.

I. Summary of Fola ALABI's Involvement

67. As described herein, FOLA ALABI own, and use the address of 11018 Croftmore Dr, Richmond, TX 77407 for his and his co-conspirator Moriamo ALABI's purported businesses. Approximately \$915,301 from 11 victims interviewed thus far have been mailed to their address at 11018 Croftmore Dr, Richmond, TX 77407.

68. As described herein, the investigation is ongoing. Based upon my review of the bank records identified above associated with FULL CIRCLE and MOBAGOLD, as well as my training and experience, there are at least 15 additional suspected victims that have not yet been interviewed and whose names appear on cashier's checks totaling approximately \$691,000 deposited into these accounts. The fraud indicators include similarities with other victims that have been interviewed such as suspected victims' ages (over 55 years old), their gender (female), their marital status (widowed or divorced), the large amounts on the checks, the fact that the checks were cashier's checks and clear faster than regular checks, and the deposit and quick movement of these funds into various accounts as well as foreign wire transfers are consistent with money laundering of victims' money.

69. As described herein, devices using Comcast IP and Verizon IPv6 addresses associated with accounts in FOLA ALABI's name, tracked packages sent via the US Postal Service from victims containing fraud funds.

70. As described herein, bank surveillance video provided by FSCU show FOLA ALABI depositing victims' cashier's checks and cash into bank accounts that he controlled.

IV. CONCLUSION

71. From my training and experience, I am aware that the online romance scheme and investment fraud scam described above is extremely widespread. According to records maintained by the Postal Inspection Service, this scheme and similar schemes have

affected thousands of victims in the United States. These victims reside throughout the United States. In my training and experience and based upon my review of the records in this case, it is likely that the same individuals who victimized the individuals have victimized other individuals using the same or similar scheme. In my training and experience, fraudsters using these mass marketing techniques tend to follow the same *modus operandi* in their interactions with different victims, which includes reusing email addresses when victimizing someone else.

72. Based on all the foregoing facts, I submit that there is probable cause to believe that FOLA ALABI on various dates violated Title 18 U.S.C. § 1341 (Mail Fraud), Title 18 U.S.C. § 1343 (Wire Fraud), Title 18 U.S.C. § 1349 (Conspiracy to Commit Mail and Wire Fraud), Title 18 U.S.C. § 1956(a)(1) (Money Laundering), 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering) and Title 18 U.S.C. § 2326 (Senior Citizens Against Marketing (“SCAMS”) Act of 1994).
73. Additionally, I believe that there is probable cause to conclude that FOLA ALABI, on various dates deposited the victim proceeds into various bank accounts, including the Bank of America, FSCU and Comerica Bank accounts containing the SUBJECT FUNDS. Therefore, some of the funds in the accounts bearing the Subject Funds are subject to seizure and forfeiture, as they constitute property derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), wire and mail fraud conspiracy (18 U.S.C. § 1349). Those funds in the bank accounts are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(C)(civil forfeiture of proceeds of mail/wire fraud or conspiracy to commit mail/wire fraud), 984 (civil forfeiture of fungible property), 2328 (criminal forfeiture of gross proceeds for SCAMS Act cases) and 28 U.S.C. § 2461 (civil or criminal forfeiture of proceeds of wire fraud or conspiracy to commit wire fraud).
74. From my consultations with assistant U.S. attorneys, I am aware that federal court decisions have defined property that is involved in a money laundering offense, and hence forfeitable under 18 U.S.C. §§ 982(a)(1) and 981(a)(1)(A), to include three categories of proceeds: (1) the proceeds of specified unlawful activity (SUA) that were the subject of a money laundering transaction; (2) funds that were commingled with SUA

proceeds at the time of the money laundering transaction; and (3) in money laundering concealment crimes, 18 U.S.C. § 1956(a)(1)(B)(ii), funds that were commingled with SUA proceeds, irrespective of whether the commingled funds were part of a money laundering transaction. I am advised that among these decisions are United States v. Huber, 404 F.3d 1047 (8th Cir. 2005); United States v. Real Property Known as 1700 Duncanville Road, 90 F. Supp.2d 737, 741 (N.D. Tex 2000), *aff'd*, 250 F.3d 738 (5th Cir. 2001) (Table); United States v. One 1987 Mercedes Benz 300E, 820 F. Supp. 248, 252 (E.D. Va. 1993); and United States v. All Monies, 754 F. Supp. 1467, 1475-76 (D. Hawaii 1991).

75. By reason of the foregoing, there is also probable cause to believe that the entirety of the funds in each of those bank accounts, namely the SUBJECT FUNDS, and separately the SUBJECT VEHICLE, which was involved in depositing fraud proceeds into accounts on three occasions, were involved in money laundering activity in violation of 18 U.S.C. § 1956(a)(1) and money laundering conspiracy in violation 18 U.S.C. § 1956(h) and are forfeitable under 18 U.S.C. §§ 981(a)(1)(A) (civil forfeiture of property involved in money laundering or any property traceable to such property), 982(a)(1) (criminal forfeiture of property involved in money laundering or any property traceable to such property).
76. There is also probable cause to believe that a restraining order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the SUBJECT FUNDS for forfeiture. I know from my training and experience that once their unlawful activities are discovered by law enforcement authorities, perpetrators of mail/wire fraud, conspiracy to commit mail/wire fraud, and money laundering crimes quickly encumber, transfer, or otherwise conceal their assets to avoid the seizure and forfeiture thereof, notwithstanding court orders to the contrary. I also know from my training and conversations with other law enforcement officers that, even where banks are ordered restrained from releasing criminal proceeds in a specified account, banks cannot always guarantee error-proof compliance with such orders. I am also aware from my training and conversations with other law enforcement officers, that restraining orders do not always prevent banks from exercising purported rights of set-off against the restrained accounts, contrary to both the restraining order and forfeiture laws governing third-party claimants.

I declare that the foregoing is true and correct.



Cory P. McManus
Postal Inspector
US Postal Inspection Service

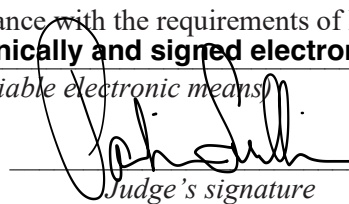
Attested to by the applicant in accordance with the requirements of Fed.
R. Crim. P. 4.1 by **Sworn telephonically and signed electronically.**
(specify reliable electronic means)

May 19, 2022

Date

Providence, Rhode Island

City and State



Judge's signature

Patricia A. Sullivan, USMJ

Patricia A. Sullivan, U.S. Magistrate Judge